

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FUNDAMENTAL INNOVATION
SYSTEMS INTERNATIONAL LLC.,

Plaintiff,

v.

TCT MOBILE (US), INC.; TCT MOBILE
(US) HOLDINGS, INC.; HUIZHOU TCL
MOBILE COMMUNICATION CO. LTD.;
and TCL COMMUNICATION, INC.,

Defendants.

C.A. No. 20-552-CFC-CJB

**PLAINTIFF'S SECOND NOTICE OF DEPOSITION OF IAN NICHOLLS
PURSUANT TO FED. R. CIV. P. 30(b)(1)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure Plaintiff Fundamental Innovation Systems Int'l will take the deposition upon oral examination of Ian Nicholls at 9:00 AM EST on October 25, 2021, or at such date and time as is otherwise agreed to by the parties. The deposition will take place remotely through Veritext Legal Solutions.

The deposition will proceed in accordance with the Federal Rules of Civil Procedure, and will be taken before a notary public or other officer authorized to administer oaths, who will swear-in the witness and administer the oath remotely. The deposition will continue until completion with such adjournments as may be necessary. The deposition will be recorded by videotape, stenographic means, or both.

Dated: October 11, 2021

/s/Brian E. Farnan

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
FARNAN LLP
919 North Market Street, 12th Floor
Wilmington, DE 19801
Tel. (302) 777-0300
Fax (302) 777-0301
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Edward J. DeFranco
Brian P. Biddinger
Joseph Milowic
Ron Hagiz
Cary E. Adickman
David Allyn Hubbard
eddefranco@quinnemanuel.com
josephmilowic@quinnemanuel.com
brianbiddinger@quinnemanuel.com
ronhagiz@quinnemanuel.com
caryadickman@quinnemanuel.com
davidhubbard@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: 212.849.7000
Facsimile: 212.849.7100

Kevin P.B. Johnson
QUINN EMANUEL URQUHART
& SULLIVAN LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: 650.801.5000
Facsimile: 650.801.5100
kevinjohnson@quinnemanuel.com

*Counsel for Plaintiff Fundamental Innovation
Systems International LLC*